

EXHIBIT 46

SATURDAY, JUNE 10, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

CONFIDENTIAL: BSA PORTIONS UNDER SEPARATE COVER

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1 QUESTIONS BY MS. LIU:

2 Q. Mr. Staley, on or about the end
3 of July 2006, after Jeffrey Epstein was
4 indicted on child sex offenses, did you speak
5 with Mr. Dimon about the fact that
6 Mr. Epstein had been indicted?

7 A. My recollection is yes.

8 Q. And how soon after the
9 indictment do you recall speaking to
10 Mr. Dimon?

11 A. I don't recall.

12 Q. And what was the context in
13 which you would have spoken to Mr. Dimon
14 about Jeffrey Epstein's indictment?

15 A. I don't recall the exact
16 conversation.

17 Q. And to the extent this was July
18 of 2006, at that time you were the head of
19 asset and wealth management and you reported
20 directly to Mr. Dimon, correct?

21 A. That's correct.

22 Q. Do you recall if you were
23 bringing this information to his attention
24 because he was your boss?

25 A. Yes.

1 Q. Do you recall if there was
2 anyone else present during your conversation
3 with Mr. Dimon?

4 A. No.

5 Q. Do you recall where the
6 conversation took place?

7 A. No.

8 Q. Where was your office at that
9 time in 2006?

10 A. It was in one of two buildings.
11 There was a building across the street from
12 the bank headquarters, and then there was
13 another building that was about four blocks
14 away. I'm not sure which building I was in
15 at that time.

16 Q. And do you recall if you sat in
17 the same building as Mr. Dimon at that time?

18 A. In 2006?

19 Q. Yes.

20 A. I don't believe so.

21 Q. Do you recall if the
22 conversation took place in person or by
23 phone?

24 A. My recollection is it was by
25 phone.

1 Q. And what, if anything, do you
2 recall about that conversation?

3 A. Just to let Jamie know that a
4 client of the bank had been indicted.

5 Q. And do you recall if at that
6 time when you were letting Jamie Dimon know
7 that Jeffrey Epstein had been indicted, if
8 Mr. Dimon already knew who Jeffrey Epstein
9 was?

10 A. I don't recall.

11 Q. Why was it that you would have
12 raised this information with Mr. Dimon
13 following Mr. Epstein's indictment?

14 A. Epstein was a client of the
15 bank. It was a -- and the indictment was a
16 very public event.

17 Q. Do you recall if at the time
18 you raised Jeffrey Epstein's indictment with
19 Mr. Dimon that he had already heard about it
20 in the news?

21 A. I don't recall.

22 Q. And do you recall anything
23 about Mr. Dimon's response to your sharing
24 the information about Jeffrey Epstein's
25 indictment?

1 wealth management, she had conversations with
2 Mr. Dimon about Jeffrey Epstein?

3 A. I would imagine so.

4 MR. GAIL: Objection.

5 QUESTIONS BY MS. LIU:

6 Q. Okay. You would imagine so,
7 but you're not aware of any actual
8 conversation; is that fair?

9 A. That's fair.

10 Q. So your testimony is that given
11 her role as the head of asset and wealth
12 management, you would have expected, as you
13 had done, that she would have reported or
14 talked to Mr. Dimon about the problems with
15 Mr. Epstein; is that fair?

16 A. That's what I would expect,
17 yes.

18 Q. Is it the case that Sandy
19 Warner had interactions with Mr. Epstein?

20 A. I believe so.

21 Q. And tell me about that.

22 MR. GAIL: Objection.

23 THE WITNESS: Sandy Warner was
24 the individual who asked that I meet
25 with Epstein, and my recollection, it

1 was following a meeting that Sandy
2 Warner had with Jeffrey Epstein.

3 QUESTIONS BY MS. LIU:

4 Q. And was that in or about the
5 2000 time period?

6 A. Yes.

7 Q. And that -- and during that
8 time period, Mr. Warner was the CEO of
9 JPMorgan, correct?

10 A. That's correct.

11 Q. And you knew Mr. Warner because
12 you worked at JPMorgan; is that fair?

13 A. That's correct.

14 Q. And tell me what you recall
15 about Mr. Warner asking you to meet with
16 Jeffrey Epstein.

17 A. Sandy Warner had met with
18 Epstein, he said, and recently he also had
19 made me head of the private bank.

23 Q. And you did meet with
24 Mr. Epstein at that time?

25 A. Yes.

1 Q. And do you recall if you ever
2 reported back to Mr. Warner, I met with
3 Mr. Epstein?

4 A. I would imagine I did, yes.

5 Q. And Mr. Epstein became a client
6 of the private bank at the time?

7 A. No, he was a client already.
8 He was a client before I met him.

9 Q. And who had the direct client
10 relationship with Jeffrey Epstein at the time
11 you met him?

12 A. I don't know.

13 Q. Did you ultimately take over
14 the client relationship with Mr. Epstein on
15 or about that 2000 time period?

16 A. No, I did not.

17 Q. What was your professional
18 relationship vis-à-vis Mr. Epstein as a
19 client of the bank at that time?

20 A. He was covered by a banking
21 team that -- I didn't know who that was. My
22 knowledge of Epstein came through Sandy
23 Warner, and I got to know him, but I was not
24 his banker.

25 Q. But you were the head of the

1 Do you see that?

2 A. Yes.

3 Q. Okay. And GIO stands for

4 global investment opportunities, correct?

5 A. I don't know.

6 Q. But it was part of the private
7 bank, correct?

8 A. It appears so.

9 (Staley Exhibit 5 marked for
10 identification.)

11 QUESTIONS BY MS. LIU:

12 0. Okay. You can put that

13 document away.

18 You recall that, correct?

19 A. Yes.

20 Q. Okay. I'm showing you now what
21 has been marked as Exhibit 5.

22 So now you'll see we're into
23 about a year later, February 24, 2005. You,
24 Jes Staley, send an e-mail to somebody named
25 Olivier de Givenchy at JPMorgan.

1 Do you see that?

2 A. Yes.

3 Q. And you say, "Ghislaine is a
4 good friend of one of our very big clients in
5 the US. Can we please try to help her?"

6 Do you see that?

7 A. Yes, I do.

8 Q. Okay. And "one of our very big
9 clients" in the context of this e-mail in
10 early 2005 is referring to Jeffrey Epstein,
11 correct?

12 A. Correct.

13 0. You can put that document away.

14 So leading up to Jeffrey

15 Epstein's indictment in 2006, it's fair to
16 say that he was one of JPMorgan's very big
17 clients; is that fair?

18 A. That's fair.

19 Q. Earlier you testified that

20 Jeffrey Epstein referred a number of clients
21 to JPMorgan over the years.

22 Is that correct?

23 A. That's correct.

24 MR. GAIL: Objection.

25

1 QUESTIONS BY MS. LIU:

2 Q. And among these clients are
3 Sergey Brin?

4 A. Yes.

5 Q. Google LLC?

6 A. Yes.

7 Q. Sultan Ahmed bin Sulayem?

8 A. Yes.

9 Q. Ehud Barak?

10 A. I don't know if Ehud became a
11 client.

12 Q. Peter Mandelson?

13 A. Also don't know if Peter became
14 a client.

15 Q. Mort Zuckerman?

16 A. Yes.

17 Q. [REDACTED]

18 A. I believe so.

19 Q. Highbridge Capital Management
20 which we discussed?

21 A. Again, as I said before, I'm
22 not sure whether Epstein introduced
23 Highbridge or -- as -- or not.

24 Q. Glenn Dubin?

25 A. Same answer.

1 Q. Kathryn Ruemmler?

2 A. Yeah, I don't know.

3 Q. Bill Gates?

4 A. Yes.

5 Q. Leon Black?

6 A. Same as Glenn. I don't know
7 how I first met Leon.

8 Q. David Gergen?

9 A. That's correct.

10 Q. Boris Nikolic?

11 A. Yes.

12 Q. Larry Summers?

13 A. Yes.

14 Q. Nathan Myhrvold with Microsoft?

15 A. Yeah, I know Nathan. I don't
16 know -- same answer. I don't know whether
17 Epstein introduced Nathan or not.

18 Q. Kimbal Musk?

19 A. I didn't know Kimbal Musk.

20 Q. Elon Musk?

21 A. Yes.

22 Q. Les Wexner?

23 A. No.

24 Q. Because Les Wexner, as you
25 described, was working with JPMorgan to take

1 The Limited public?

2 A. That's correct.

3 Q. George Mitchell?

4 A. I don't know.

5 Q. Bill Richardson?

6 A. Yes.

7 Q. Okay. And you suggested on
8 Ehud Barak you weren't sure whether or not he
9 became a client of JPMorgan's; is that fair?

10 A. That's fair.

11 Q. Okay. But Jeffrey Epstein did
12 set up various meetings between employees of
13 the bank and Ehud Barak; is that correct?

14 A. I met Ehud Barak. I don't know
15 if he set up meetings with other people from
16 Morgan.

17 Q. Are you aware whether or not
18 Mr. Dimon also met with Ehud Barak?

19 MR. GAIL: Objection.

20 THE WITNESS: I don't recall.

21 QUESTIONS BY MS. LIU:

22 Q. To the extent Mr. Dimon met
23 with Mr. Barak, would that have been a
24 meeting that would have been facilitated by
25 Mr. Epstein?

1 MR. GAIL: Triple objection.

2 QUESTIONS BY MS. LIU:

3 Q. You can answer, sir.

4 A. Ask the question again?

5 Q. To the extent Mr. Dimon met
6 with Ehud Barak, would that have been a
7 meeting facilitated by Jeffrey Epstein?

8 MR. GAIL: Objection.

9 THE WITNESS: That's -- I don't
10 know.

11 QUESTIONS BY MS. LIU:

12 Q. Do you know if Mr. Dimon had
13 any independent connection to Ehud Barak?

14 A. I don't know.

15 Q. I think with respect to Peter
16 Mandelson, you also suggested you don't know
17 if he became a client of the bank; is that
18 correct?

19 A. That's correct.

20 Q. But did Mr. Epstein facilitate
21 meetings with persons at the bank, including
22 yourself and Mr. Mandelson?

23 A. He facilitated meetings between
24 myself and Peter Mandelson, yes.

25 Q. And do you know if Mr. Dimon

1 ever met or -- I'll rephrase.

2 Do you know if Mr. Dimon ever
3 met with Mr. Mandelson?

4 A. I don't know.

5 Q. And to the extent you met with
6 Ehud Barak, that meeting was arranged by --
7 or those meetings were arranged by Jeffrey
8 Epstein; is that fair?

9 A. That's fair.

10 Q. Do you recall Mr. Epstein
11 arranging a meeting between you and the
12 Sultan of Dubai in early 2006?

13 A. I don't recall.

14 Q. Do you recall meeting with the
15 Sultan of Dubai?

16 A. Yes.

17 Q. And do you recall meeting with
18 the Sultan of Dubai while you were the head
19 of asset and wealth management at JPMorgan?

20 A. Yes.

21 Q. And to the extent -- I'll
22 rephrase.

23 You met with Mr. Dubai {sic} as
24 part of your position as the head of asset
25 and wealth management at JPMorgan, correct?

1 A. Dubai is a country, not his
2 name.

3 Q. And I apologize. I'm looking
4 at a document.

5 But "the Sultan" we're
6 referring to, Ahmed bin Sulayem, right?

7 A. Yes.

8 Q. And you recall that the meeting
9 that Mr. Epstein arranged for you with Sultan
10 Ahmed bin Sulayem was taken by you as part of
11 your role as the head of asset and wealth
12 management at JPMorgan?

13 A. Yes.

14 Q. And is it fair to say that your
15 meeting with Ehud Barak, or your meetings
16 with Ehud Barak, were also taken by you as
17 part of your role as an executive at
18 JPMorgan?

19 A. Yes.

20 Q. And same question for Bill
21 Gates. You met with Bill Gates on various
22 occasions, correct?

23 A. Yes.

24 Q. And again, is it fair to say
25 that your meetings with Bill Gates, arranged

1 by Jeffrey Epstein, were taken by you as part
2 of your role as the head of asset and wealth
3 management at JPMorgan?

4 A. Yes.

5 Q. You also met with Larry
6 Summers, correct?

7 A. Correct.

8 Q. And to the extent those
9 meetings were arranged by Jeffrey Epstein,
10 were those meetings taken by you as part of
11 your role as the head of asset and wealth
12 management at JPMorgan?

13 A. Yes.

14 VIDEOGRAPHER: Mimi, can we
15 pause one moment?

16 MS. LIU: Sure.

17 VIDEOGRAPHER: We have a random
18 phone number that wants to enter into
19 the Zoom.

20 MS. LIU: Can we go off the
21 record?

22 VIDEOGRAPHER: Stand by.

23 11:07. We are off the video record.

24 (Off the record at 11:07 a.m.)

25 VIDEOGRAPHER: 11:09, we are on

1 the video record.

2 (Staley Exhibit 6 marked for
3 identification.)

4 QUESTIONS BY MS. LIU:

5 Q. Mr. Staley, you're being handed
6 what has been marked as Exhibit 6.

7 You'll see there's an e-mail
8 from Jeffrey Epstein dated May 5, 2014, to
9 you, Jes Staley.

10 Do you see that?

11 A. Yes.

12 Q. Okay. And he's forwarding a
13 message from Sultan bin Sulayem dated May 5,
14 2014.

15 Do you see that?

16 A. Yes.

17 Q. And if you could turn to the
18 next two pages, you see that there are two
19 photographs there of Jamie Dimon and Sultan
20 bin Sulayem?

21 A. Yes.

22 Q. Do you know if Jeffrey Epstein
23 was the one who would have facilitated any
24 later meeting between Mr. Dimon and
25 Mr. Sulayem?

1 A. I don't know.

2 Q. And what is DP World? Do you
3 know?

4 A. I believe it is Dubai Port.

5 Q. And that's a conference, DP
6 World?

7 A. I think DP, Dubai Ports, is a
8 part of the Dubai government. I don't know
9 what -- whether it's a conference or whether
10 it's their building.

11 Q. During your time period working
12 at JPMorgan, are you aware whether or not
13 Mr. Dimon had interest in meeting with the
14 Sultan bin Sulayem?

15 A. No, I'm not aware.

16 Q. Let me ask you about a few
17 other names that I didn't see in the
18 discovery responses that you provided in this
19 case.

20 Michael Ovitz, was that a
21 client referred to by -- referred to the bank
22 by Jeffrey Epstein?

23 A. I don't believe Ovitz was
24 referred by Epstein, no.

25 Q. But Ovitz had some connection

1 to Jeffrey Epstein; is that fair?

2 A. I don't know what sort of
3 connection Ovitz had with Epstein.

4 Q. What about Andrew Farkas?

5 A. I believe so.

6 Q. But he was a referral with
7 Jeffrey Epstein's to the bank?

8 A. I believe -- or -- I don't
9 know.

10 Q. Prince Andrew?

11 A. I don't -- I'm not sure if
12 Prince Andrew became a client of the bank.

13 Q. But Jeffrey Epstein at least
14 facilitated meetings between persons working
15 at the bank and Prince Andrew; is that fair?

16 A. Yes.

17 Q. Do you recall in or about 2012
18 or 2013 that Mr. Dimon was invited to a
19 dinner at Buckingham Palace hosted by Prince
20 Andrew?

21 A. I am not aware of that.

22 Q. Do you know during your time
23 period working at JPMorgan whether Mr. Dimon
24 had any separate or independent relationship
25 with Prince Andrew apart from the one that

1 Jeffrey Epstein brought to the bank?

2 A. I don't know.

3 MR. GAIL: Objection. That
4 assumes facts not in evidence. That
5 is outrageous.

6 QUESTIONS BY MS. LIU:

7 Q. You can answer the question.

8 A. Can you ask the question again?

9 Q. Yes.

10 Do you know during your time
11 period working at JPMorgan whether Mr. Dimon
12 had any separate or independent relationship
13 with Prince Andrew apart from the one that
14 Jeffrey Epstein brought to the bank?

15 MR. GAIL: Objection.

16 There's no evidence that there
17 was a separate relationship, and
18 you're baking it into your question.

19 Just ask whether he had a relationship
20 with him.

21 QUESTIONS BY MS. LIU:

22 Q. You can answer the question.

23 A. So ask again?

24 Q. Do you know during your time
25 period working at JPMorgan, sir, whether

1 Mr. Dimon had any independent relationship
2 with Prince Andrew?

3 MR. GAIL: Objection.

4 THE WITNESS: I don't know.

5 QUESTIONS BY MS. LIU:

6 Q. You're not aware of one; is
7 that fair?

8 MR. GAIL: Objection.

9 Not aware of any relationship.

10 THE WITNESS: Yeah, I'm not
11 aware. I was not aware.

12 QUESTIONS BY MS. LIU:

13 Q. Mr. Staley, you're not
14 represented by counsel for JPMorgan in this
15 deposition, are you?

16 A. No.

17 MR. SULLIVAN: I'll let him
18 know if that occurs.

19 MR. GAIL: We don't profess
20 otherwise.

21 QUESTIONS BY MS. LIU:

22 Q. Mr. Staley, do you recall at
23 various times Mr. Epstein promoting Mr. Dimon
24 to head up the Treasury Department?

25 A. No, I'm not aware of that.

1 on this."

2 Do you see that?

3 A. Yes.

4 Q. And then Todd writes, "Did Ace
5 go to him for an exception to the felon
6 policy?"

7 Do you see that?

8 A. Yes.

9 Q. Do you have any understanding
10 from your time at the bank what an exception
11 to the felon policy meant?

12 A. No, not specifically here.

13 Q. And are you familiar with any
14 conversations between Ace Greenberg and Steve
15 Cutler or anybody about keeping Jeffrey
16 Epstein as a client at the bank in this time
17 period?

18 A. I was not part of these
19 conversations.

20 Q. Was Ace Greenberg at this time
21 a fairly important person at JPMorgan? Did
22 he have any heft?

23 A. He was -- yeah, Ace Greenberg
24 was important.

25 Q. Okay. You can put that

1 of your meeting or relationship with Darling?

2 A. Not that I know of, no.

3 Q. Okay.

4 A. Or not that I recall, no.

5 Q. Okay. If we go down one more,

6 January 25, 2010, this is another e-mail,

7 Epstein to Staley. "The more time you have

8 to announce, the better. I have set you up

9 and Peter to meet in Davos with Darling."

10 This is a reference to Peter
11 Mandelson?

12 A. I believe so.

13 Q. Do you remember meeting with
14 Peter Mandelson in Davos? At Davos?

15 A. Yes.

16 Q. And how many times did you
17 ultimately meet with Peter Mandelson?

18 A. I don't -- just a handful.

19 Q. If we go down to the last
20 bullet point on that page, it's talking about
21 an individual named Thomas -- Tom Pritzker.

22 Do you know who that is?

23 A. Yes.

24 Q. Is that somebody who was -- who
25 Jeffrey Epstein introduced you to?

1 A. I believe so.

2 Q. And did Tom Pritzker ever
3 become a client of JPMorgan?

4 A. I believe he did.

5 Q. When Jeffrey Epstein made these
6 connections, in this instance, such as the
7 one with Tom Pritzker, was Jeffrey Epstein
8 ever paid as a consultant, an advisor, or any
9 other way for making that connection?

10 A. Not that I'm aware of, no.

11 Q. As you sit here now, do you
12 understand why it was that Jeffrey Epstein
13 would go through the effort of making the
14 connection for you with somebody like Tom
15 Pritzker?

16 A. Again, I think he valued his
17 network of contacts, and introducing me to
18 Tom, vice versa, enhanced that network for
19 him.

20 Q. A connection such as Tom
21 Pritzker was valuable to JPMorgan, right?

22 A. True. Yes.

23 Q. And a -- and that connection
24 was then likely valuable for Tom Pritzker,
25 right?

1 A. No.

2 Q. Did you understand him to have
3 a massage room at his home?

4 A. Yes.

5 Q. Were you given a tour of his
6 home where you saw the massage room?

7 A. A tour of the whole house.

8 His main living room was on the second floor,
9 and I think that's where the room was.

10 Q. So did he show you the massage
11 room?

12 A. I don't know whether he -- I
13 just -- whether I just saw it in passing.

14 Q. Did you take the elevator up to
15 the massage room?

16 A. No.

17 Q. The stairs?

18 A. Yes.

19 Q. Okay.

20 A. Well, not to the massage room.
21 I took the stairs up to the second floor.

22 Q. Were there other individuals
23 that you remember by name having met at
24 Jeffrey Epstein's townhouse?

25 A. Ask it again?

1 Q. Were there other individuals,
2 asides -- beside Jeffrey Epstein, that you
3 met at Jeffrey Epstein's townhouse that you
4 remember by name?

5 A. Yes.

6 Q. Who?

7 A. Bill Gates.

8 Q. Okay.

9 A. Leon Black. Katie Couric. Eva
10 Dubin. [REDACTED]

11 Q. [REDACTED]

12 A. Yeah, I believe so.

13 Q. Okay.

14 A. Larry and Sergey Brin. The
15 Sultan.

16 Those would be, you know, off
17 the top of my head.

18 Q. Okay. Switching to a different
19 class of people. Did you meet any of Jeffrey
20 Epstein's staff or friends or any of the
21 females that were at his house?

22 A. Yes.

23 Q. And who?

24 A. Lesley Groff.

25 Q. What did you understand Lesley

1 Groff's position to be?

2 A. His secretary.

3 Q. Okay. Most of the scheduling
4 of the meetings and things of that nature
5 went through Lesley, the same way you went
6 through Rosa?

7 A. Right.

8 Q. Okay.

9 A. Eva Dubin.

10 Q. What did you understand her
11 relationship to be as it related to Jeffrey
12 Epstein, aside from being Glenn Dubin's wife?

13 A. They dated for about ten years,
14 is my understanding.

15 Q. A long time in the past, right?

16 A. Yes.

17

18 Q. What did you understand

19 [REDACTED] 's role to be?

20 A. She was one of his assistants.

21 Q. Okay. How many times do you
22 remember meeting [REDACTED]?

23 A. A number of times.

24 Q. Okay. Anybody else?

25 A. He had a couple that took care

1 of the house. I don't remember their names.

2 Q. Jo Jo Fontanella?

3 A. I don't remember their names.

4 Q. Okay.

5 A. Off the top of my head, those
6 are --

7 Q. Did you meet [REDACTED]?

8 A. Yes. Sorry.

9 Q. And in what context did you
10 meet [REDACTED]?

11 A. She was also one of his
12 assistants.

13 Q. And what did you think that her
14 role was?

15 A. You know, he had a lot of
16 properties. He traveled around. He had
17 assistants that helped him with all that.

18 Q. What did you understand Jeffrey
19 Epstein's business to be on a day-to-day
20 basis?

21 A. My understanding was -- well,
22 he managed his network. My understanding,
23 you know, he didn't have a business, per se;
24 that his wealth was accumulated from his
25 relationship with Les Wexner.

15 SUNDAY, JUNE 11, 2023
16 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

18 Videotaped deposition of James E.
19 Staley, Volume II, held at the offices of
20 Boies Schiller Flexner, LLC, 55 Hudson Yards,
21 New York, New York, commencing at 9:07 a.m.
Eastern, on the above date, before Carrie A.
Campbell, Registered Diplomat Reporter and
Certified Realtime Reporter.

23 - - -
24 GOLKOW LITIGATION SERVICES
25 877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 A. No.

2 Q. If I asked you the question --

3 A. I don't recall how many times.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

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13	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]
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18	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]
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1 Q. Do you remember, did you walk
2 to 301?

3 A. I don't recall.

4 Q. Did you ever walk to Jeffrey's
5 townhouse from your place?

6 A. Yes.

7 Q. Okay. Is that typically how
8 you would visit, is you would walk from your
9 place to his?

10 A. No.

11 Q. There was an e-mail that we
12 looked at yesterday where you were writing to
13 somebody else in JPMorgan that you spoke with
14 Jeffrey Epstein and he denied the ages.

15 Do you remember that?

16 A. Yes.

17 Q. And he had been accused at that
18 point in time of having erotic massages with
19 a bunch of children and paying them for it.

20 Do you remember that? Those
21 being the allegations?

22 A. In what year are you talking
23 about?

24 Q. Sure. This is after he was
25 indicted in 2006 and before he pleads guilty

1 in 2008.

2 During that period of time, he
3 was accused of sexual interactions with
4 children, and he was paying them money,
5 right?

6 A. I don't recall them being
7 called children, though.

8 Q. Okay. Well, you remember that
9 the charge was procurement of a minor for
10 prostitution?

11 A. Yes.

12 Q. And he was essentially charged
13 with obtaining erotic massages from young
14 females who, during the course of that
15 investigation, were revealed to be underage,
16 and he was paying them cash in exchange for
17 those erotic massages.

18 Do you remember that?

19 A. Yes.

20 Q. And you reported back to the
21 bank that Jeffrey Epstein denied the ages,
22 correct?

23 A. That's correct.

24 Q. Jeffrey Epstein was not denying
25 the conduct, right?

1 A. That's right.

2 Q. The conduct that he was being
3 accused of, he was admitting that he did it.
4 He was just denying that he knew the ages of
5 the victims, right?

6 A. Correct.

7 Q. And you were reporting that
8 back to the bank, that what was being denied
9 is the ages, right?

10 A. Right.

11 Q. So the bank has, essentially,
12 all of the information that you had at the
13 time, which is that Jeffrey Epstein is
14 admitting to this conduct of engaging in sex
15 for money with young women. And the only
16 thing he was disputing is the age of the --
17 of the potential victims, right?

18 A. Right.

19 Q. So the bank is understanding --
20 is getting an e-mail from you that Jeffrey
21 Epstein, the only thing he's contending over
22 here is the ages, right?

23 A. Yes.

24 Q. And so when the bank is
25 receiving that information, they now know

1 what you know, which is, this is the type of
2 conduct that our client is engaging in, and
3 the only dispute that he has about the
4 allegations are the ages of the victims,
5 right?

6 A. That's correct.

7 Q. And based on that information
8 that they are receiving, meaning JPMorgan is
9 receiving, Stephen Cutler and anybody else
10 who had the ability to exit Jeffrey Epstein
11 elect instead to keep Jeffrey Epstein as a
12 client, right?

13 A. Yes.

14 Q. There was a point that was made
15 earlier about your sharing information that
16 was internal JPMorgan information not to be
17 disseminated to the public.

18 Do you remember that?

19 A. Yes.

20 Q. And it was framed as a
21 potential violation of the code of conduct in
22 that information that was internal
23 information to JPMorgan was being shared with
24 Jeffrey Epstein.

25 Do you remember that?